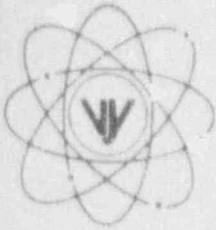


VERMONT YANKEE NUCLEAR POWER CORPORATION



Ferry Road, Brattleboro, VT 05301-7002

REPLY TO:
ENGINEERING OFFICE
580 MAIN STREET
BOLTON, MA 01740
(508) 779-6711

May 15, 1992
BVY 92 - 54

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

- References:
- a. License No. DPR-28 (Docket No. 50-271)
 - b. Letter, VYNPC to USNRC, FVY 87-116, dated December 16, 1987
 - c. Letter, USNRC to VYNPC, NVY 90-051, dated March 9, 1990
 - d. Letter, VYNPC to USNRC, BVY 90-045, dated April 19, 1990
 - e. Letter, VYNPC to USNRC, BVY 90-054, dated May 10, 1990
 - f. Letter, VYNPC to USNRC, BVY 91-024, dated March 6, 1991
 - g. Letter, USNRC to VYNPC, NVY 92-002, dated January 28, 1992
 - h. Letter, VYNPC to USNRC, BVY 92-039, dated March 27, 1992

Subject: FROSSTEY-2 Fuel Performance Code - Vermont Yankee Response to Remaining Concerns

Dear Sir:

By Reference (b), Vermont Yankee submitted a revised fuel performance code, FROSSTEY-2, for NRC review. In Reference (c), NRC requested additional information from Vermont Yankee. Responses to NRC's request for additional information were provided by Vermont Yankee in References (d), (e), and (f).

In Reference (g), NRC transmitted to Vermont Yankee a summary report from Battelle Pacific Northwest Laboratories (PNL) concerning the remaining open issues regarding FROSSTEY-2 code review. Reference (h) provided Vermont Yankee's responses to NRC/Battelle's concerns regarding the LOCA-related application of FROSSTEY-2.

On April 7, 1992, a meeting was held at NRC headquarters in Rockville, MD between representatives of Yankee Atomic, Vermont Yankee, NRC staff, and Battelle to discuss resolution of the remaining NRC/Battelle concerns. General agreement was reached in this meeting regarding Vermont Yankee's approach to resolution of the outstanding issues that remain and, as a result, it was agreed that Vermont Yankee would provide a final submittal to address all remaining concerns.

The purpose of this letter is to formally transmit Vermont Yankee's response to all remaining LOCA-related and non-LOCA related concerns regarding our FROSSTEY-2 fuel performance code approval application. This information is attached to this letter as Enclosure B.

WITHHOLD ENCLOSURES
FROM PUBLIC DISCLOSURE

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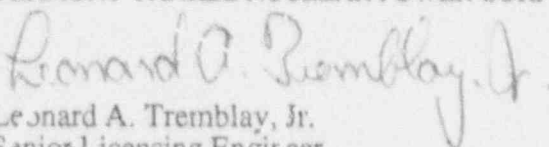
United States Nuclear Regulatory Commission
May 15, 1992
Page 2

The enclosed information is considered proprietary by Yankee Atomic Electric Company. In accordance with 10CFR2.790(b)(1), an affidavit attesting to the proprietary nature of the enclosed information is attached as Enclosure A.

We trust that this information will satisfactorily resolve all remaining NRC/Battelle concerns relative to our FROSSTEY-2 code approval application and we look forward to NRC approval of this code. However, should you have any additional questions with regard to the enclosed material, please contact this office.

Very truly yours,

VERMONT YANKEE NUCLEAR POWER CORPORATION


Leonard A. Tremblay, Jr.
Senior Licensing Engineer

Enclosure A: Affidavit
Enclosure B: Proprietary Information

cc: USNRC Region I Administrator (w/o enclosures)
USNRC Resident Inspector - VYNPS (w/o enclosures)
USNRC Project Manager - VYNPS (with enclosures)
Mr. Carl Beyer, Batelle/PNL (with enclosures)
Mr. Shih-Liang Wu - NRC/Rockville (with enclosures)

WITHHOLD ENCLOSURES
FROM PUBLIC DISCLOSURE

AFFIDAVIT PURSUANT

TO 10CFR2.790

Yankee Atomic Electric Company)
Nuclear Services Division)
Commonwealth of Massachusetts)
Worcester County) SS:

I, S. P. Schultz, depose and say that I am the Vice President of Yankee Atomic Electric Company, duly authorized to make this affidavit, and have reviewed or caused to have reviewed the information which is identified as proprietary. I am submitting this affidavit in accordance with the provisions of 10CFR2.790 of the Commission's regulations for withholding this information.

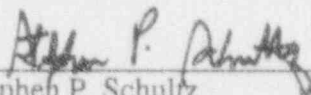
The information for which proprietary treatment is sought is contained in the enclosures to our letter, Vermont Yankee Nuclear Power Corporation to U. S. Nuclear Regulatory Commission, dated May 15, 1992.

Pursuant to the provisions of Paragraph (b) (4) of Section 2.790 of the Commission's regulations, the following is furnished for consideration by the Commission in determining whether the information sought to be withheld from public disclosure, included in the above referenced document, should be withheld.


1. The material contained in this transmittal was obtained at considerable expense to Yankee Atomic Electric Company and Vermont Yankee Nuclear Power Corporation and the release of which would seriously affect our competitive position.
2. The material contained in this transmittal is of the type customarily held in confidence and not customarily disclosed to the public.
3. This information is being transmitted to the Commission in confidence under the provisions of 10CFR2.790 with the understanding that it is to be received in confidence by the Commission.
4. This information is for Commission internal use only and should not be released to persons or organizations outside the Directorate of Regulation and the ACRS without prior approval of Yankee Atomic Electric Company. Should it become necessary to release this information to such persons as part of the review procedure, please contact Yankee Atomic Electric Company.

Further deponent sayeth not.

Sworn to before me this
15th day of May, 1992



Stephen P. Schultz
Vice President



Kathryn Gates Notary Public
My Commission Expires 1/24/97